

ABRAMS FENSTERMAN

Abrams, Fensterman, Fensterman, Eisman, Formato, Ferrara, Wolf & Carone, LLP

Attorneys at Law
www.abramslaw.com

1 MetroTech Center
Suite 1701
Brooklyn, New York 11201
Phone: (718) 215-5300
Fax: (718) 215-5304
FAX NOT FOR LEGAL SERVICE

FIRM OFFICES

Lake Success
New York
Rochester

March 16, 2018

FEDERAL EXPRESS

Senior Judge I. Leo Glasser
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

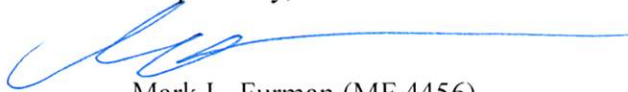
Re: *State Farm Insurance, et al. v. Parisien, et al.*
Case No.: 18-cv-289 (ILG)(ST)

Dear Judge Glasser:

In accordance with Part III of Your Honor's rules, enclosed please find courtesy copies of our Memorandum of Law in Opposition to Plaintiffs' Motion for a Preliminary Injunction and Stay of State Proceedings (Docket No. 50) and Supporting Declaration with Exhibits A through L (Docket No. 51), which were filed via ECF late yesterday, March 15, 2018 on behalf of the below named parties-defendant.¹ Since the Parties' agreed-upon briefing schedule stipulation (Docket No. 29) does not include any opportunity for Plaintiffs to submit a reply, we deem the Motion to be fully briefed accordingly.

We thank the Court for its consideration of the enclosed documents.

Respectfully,



Mark L. Furman (MF 4456)

¹ (1) Jules Parisien, M.D. and his professional medical corporations ("PCs") JPF Medical Services, P.C. and PFJ Medical Care P.C. (2) Ksenia Pavlova, D.O., and her PCs, Allay Medical Services, P.C. and KP Medical Care P.C., (3) Luqman Dabiri, M.D., (4) Frances Lacina, D.O., and his PCs, JFL Medical Care P.C., FJL Medical Services P.C. and RA Medical Services, P.C., (5) Darren T. Mollo, D.C., and his PCs Darren Mollo D.C., P.C., ACH Chiropractic, P.C., Energy Chiropractic, P.C., and Island Life Chiropractic Pain Care, PLLC, (6) Charles Deng, L.A.c, and his PC Charles Deng Acupuncture, P.C., (7) MSB Physical Therapy P.C., (8) David Mariano, P.T., (Nos. 1 through 8 are deemed collectively as "the Professional Defendants") (9) Maiga Products Corporation, (10) Madison Products of USA, Inc., (11) Quality Health Supply Corp., (12) AB Quality Health Supply Corp., and (13) Personal Home Care Products Corp. (Nos. 9 through 13 are deemed collectively as "the DME Defendants").